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| Post-It™ brand fax transmittal memo 7671 | |
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June 24, 1996

State of Idaho comments on the Monsanto Draft Proposed Plan.

This paper conveys the State of Idaho's perspective on the Draft Monsanto Proposed Plan. We support the approach taken in the Proposed Plan. Most of our comments elate to utilization of institutional controls (IC) with contingencies for offsite soils.

We have the following comments on the Proposed Plan:

1. The contingencies for offsite soils should not be required to be implemented parallel to the implementation of ICs. The contingencies should be implemented after it has been shown that ICs have not been implemented in a reasonable time frame as determined by the agencies.
2. The ISB contingency for offsite is a relatively unproven technology with significant implementability and cost concerns. To allow greater opportunity for other treatment technology applications, we suggest changing ISB to In situ Treatment as a general response option. This will allow evaluation of other in situ treatment technologies if ICs implementation fails.
3. The time frame for requiring offsite soil contingency implementation needs to be more flexible to facilitate successful implementation of ICs. Wording as discussed in the conference call such as a "reasonable time period as determined by the agencies" is suggested.
4. On page 2, in the first full paragraph, it is stated, "The State of Idaho's Department of Health and Welfare has worked with the EPA to oversee the RI/FS. . ." This portion of the statement should stand alone with the remaining portion of that statement regarding concurrence deleted from this section. The concurrence statement is found in the criteria section, and it is unnecessary to make the statement twice.
5. Change the name of Alternative 8 to "Dust Control, Land Use and Access Restrictions, Groundwater Monitoring, and Soil Removal." The current title for Alternative 8 is the same as the title for Alternative 4. This causes confusion regarding the elements of the two alternatives.
6. The general statement calling for use ICs to address offsite soils without specifying the type that would be required is appropriate for this Proposed Plan. *including item 6 of 20*

The State of Idaho will formally notify EPA of it's position relative to concurrence with the Record of Decision pending receipt and consideration of public comments. At this time we support release of the Proposed Plan for public comment upon resolution of the above concerns. We recommend a conference call to address these concerns, if necessary.

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